

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

Edward Butowsky,

Plaintiff,

v.

David Folkenflik, et al.,

Defendants

Case No. 4:18-cv-442-ALM

**PLAINTIFF'S UNOPPOSED MOTION
FOR EXTENSION OF TIME TO RESPOND**

NOW COMES Edward Butowsky, the Plaintiff, moving the Court to grant him an extension of time to respond to the Defendants' Notice of Supplemental Evidence in Support of Motion to Compel (Doc. No. 131):

Since May 4, 2020, Plaintiff's Counsel has been staying with elderly family members in Texas, one of whom is unable to care for herself. These duties require round-the-clock attention and, as a result, Plaintiff's Counsel is largely unable to work. Another family member is scheduled to take over these responsibilities on May 18, 2020, at which point Plaintiff's Counsel will return to his home in New York. The Plaintiff moves the Court to extend the deadline for responding to the Defendants' Notice of Supplemental Evidence in Support of Motion to Compel from May 15, 2020 until May 20, 2020. The Plaintiff has conferred with counsel for the Defendants, and the Defendants do not oppose this request.

Respectfully submitted,

/s/ Ty Clevenger

Ty Clevenger

Texas Bar No. 24034380

P.O. Box 20753

Brooklyn, New York 11202-0753

(979) 985-5289

(979) 530-9523 (fax)

tyclevenger@yahoo.com

Attorney for Plaintiff Edward Butowsky

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for the Defendants via email, and the Defendants do not oppose this motion.

/s/ Ty Clevenger

Ty Clevenger

CERTIFICATE OF SERVICE

I certify that a copy of this document was filed electronically with the Court's ECF system on May 14, 2020, which should result in automatic notification to all counsel of record.

/s/ Ty Clevenger

Ty Clevenger